



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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April 27, 2005

Richard M. Gabrys, Treasurer
Michigan Republican Party
2121 East Grand River Ave.
Lansing, MI 48912

Response Due Date:
May 27, 2005

Identification Number: C00041160

Reference: 30 Day Post-General Report (10/14/04-11/22/04)

Dear Mr. Gabrys:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule B supporting Line 21(b) of your report discloses a payment(s) totaling \$2,149.07 for "POSTAGE/FREIGHT" and "PRINTING/TYPESETTING." Expenditures and disbursements for public communications (as defined under 11 CFR §100.26) that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any candidate for Federal office, meet the definition of Federal Election Activity under 11 CFR §100.24 and should be disclosed on Schedule B for Line 30(b) along with the identity of the candidate(s).

Further, public communications that meet the definition of Federal Election Activity and that also contain express advocacy as defined under 11 CFR §100.22, but do not meet the conditions of exempt activity, would constitute an in-kind contribution, an independent expenditure or a coordinated party expenditure and should be properly disclosed on a Schedule B, E or F supporting Lines 23, 24 or 25, as appropriate, rather than on Schedule B for Line 30(b). Please amend your report to properly disclose this activity or provide clarifying information.

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-Please clarify all expenditures made for "TELEMARKETING FUNDRAISING" and "FEA: ROOM RENTAL" on Schedule(s) B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24, or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Schedule B supporting Line 30(b) of the Detailed Summary Page discloses \$176,012.82 in disbursements for "FEA: CLOTHING - VOLUNTEERS," "FEA: POSTAGE - T-SHIRTS" and "FEA: T-SHIRTS - BUSH" on behalf of George W. Bush. Please be advised that a state or local party committee may pay for campaign materials (such as bumper stickers) that are distributed by volunteers in connection with activity on behalf of the party's nominees in a general election. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used, including distribution by direct mail (mailings by a commercial vendor or from commercial lists); all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §§100.87 and 100.147 and to the Campaign Guide for Party Committees.

Please clarify the nature of the aforementioned disbursement(s). If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B, E or F supporting Line 23, 24 or 25 of the Detailed Summary Page as appropriate.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) B, H6 and L-B of your report to clarify the following description(s): "FEA: FUNDRAISING - NON CAND," "FEA: GOTV," "FEA: GOTV - BUSH," "FEA: GOTV PIECE," "LEVIN: VOTER IDENTIFICATION" and "LEVIN FUNDS TRANSFER." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

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